



**SECURITIES AND EXCHANGE COMMISSION**  
**DIVISION OF ENFORCEMENT**  
100 F Street, N.E.  
WASHINGTON, DC 20549

James E. Smith  
Assistant Chief Litigation Counsel  
Trial Unit, Mail Stop 5971  
(202) 551-5881 (t)  
(202) 772-9292 (f)  
Smithja@SEC.gov

April 22, 2022

**BY CM/ECF**

The Honorable Rukhsana L. Singh  
United States Magistrate Judge  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Building  
402 East State Street  
Trenton, New Jersey 08608

Re: *Securities and Exchange Commission v. Princeton Alternative Funding, LLC, et al.*, No. 3:21-cv-12971 ZNQ-RLS

Dear Hon. Magistrate Judge Singh:

Pursuant to the Court's request during the April 19, 2022 status call, in the above-referenced case, Plaintiff Securities and Exchange Commission and Defendants, Princeton Alternative Funding, LLC, Microbilt Corporation, Phillip N. Burgess, Jr., Walter Wojciechowski, and John Cook, Jr., (collectively the "Parties"), by and through their undersigned counsel, submit this revised discovery schedule request. The parties respectfully request the Court revise its Pretrial Scheduling Order (Dkt. No. 23) as follows:

- |                              |            |
|------------------------------|------------|
| • End of Fact Discovery      | 9/30/2022  |
| • Affirmative Expert Reports | 11/14/2022 |
| • Rebuttal Expert Reports    | 12/30/2022 |
| • Expert discovery done      | 1/30/2023  |
| • Dispositive Motions        | 2/28/2023  |

The parties believe that this revised schedule should permit sufficient time to complete fact and expert discovery in this matter, and will update the Court if it appears that additional time is needed to complete all necessary depositions and discovery tasks.

Respectfully submitted,

<p><u>/s/ James E. Smith</u> James Smith SECURITIES AND EXCHANGE COMMISSION 100 F Street, NE Washington, DC 20549 (202) 551-5881 (Smith) smithja@sec.gov</p> <p><i>Counsel for Plaintiff</i></p>	<p><u>/s/ Daniella Gordon</u> Daniella Gordon Armstrong Teasdale, LLP 2005 Market Street 29<sup>th</sup> Floor, One Commerce Center Philadelphia, PA 19103 (267) 780-2017 dgordon@atllp.com</p> <p>John A. Sten Armstrong Teasdale, LLP 800 Boylston Street 30<sup>th</sup> Floor Boston, MA 02199 (617) 824-5128 jsten@atllp.com</p> <p><i>Counsel for Defendants</i></p>
--	--